

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. DOUGLAS SHAPIRO, Defendant.	Adv. Pro. No. 10-04543 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including June 10, 2016.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: May 12, 2016
New York, New York

By: /s/ Nicholas J. Cremona
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Dean D. Hunt
Email: dhunt@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

By: /s/ Christopher M. Desiderio
Nixon Peabody LLP
437 Madison Avenue
New York, NY 10022-7039
Telephone: (212) 940-3000
Facsimile: (212) 940-3111
Christopher M. Desiderio
Email: cdesiderio@nixonpeabody.com

Jeck, Harris, Raynor & Jones, PA
790 Juno Ocean Walk, Suite 600
Juno Beach, FL 33408-1121
Telephone: (561) 331-2597
Facsimile: (561) 747-4113
Geoffrey L. Jones
Email: gjones@jhrjpa.com

Attorneys for Defendant Douglas Shapiro

By: /s/ Ted A. Berkowitz
Farrell Fritz, P.C.
370 Lexington Avenue, Suite 800
New York, New York 10017
Telephone: (212) 687-1230
Facsimile: (212) 687-2175
Ted A. Berkowitz
Email: tberkowitz@farrellfritz.com

Mediator